

DAI & ASSOCIATES, P.C.
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GINTER LOGISTICS SERVICE CO., LTD.,

Docket No.: 07-CIV-8677 (LAP)

Plaintiff,

REPLY

-against-

ACH FREIGHT FORWARDING, INC., JIMIN ZHOU
a/k/a JIMMY ZHOU, XIAO JI HE d/b/a PACIFIC JIN
AN TRADING, INC. and XIN MAIO, INC.,

Defendants.

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**REPLY TO DEFENDANT'S ACH FREIGHT
FORWARDING, INC.'S COUNTERCLAIM**

Plaintiff, GINTER LOGISTICS SERVICE CO., LTD, by its attorneys, DAI & ASSOCIATES, P.C., as and for its Reply to the Counterclaim of Defendant, ACH FRIEGHT FORWARDING, INC., dated July 21, 2008 and in compliance with Rule 12(b) of the Federal Rules of Civil Procedure, sets forth the following:

FIRST: With regards to the allegations and denials contained in paragraph 57, as it merely repeats and realleges Defendant's prior denial and affirmative defense, and as such, Plaintiff denies each and every allegation of a factual nature contained in paragraphs 1 though 56, except as to those allegation that Defendant's admit.

SECOND: Plaintiff does not have sufficient knowledge or information to form a belief as to the allegations set forth in paragraph 58.

THIRD: Plaintiff denies each and every allegations in paragraph 59 to the extent that it admits it is a Chinese corporation and exists pursuant to the laws of the People's Republic of China.

FOURTH: Plaintiff denies each and every allegation in paragraph 60.

FIFTH: Plaintiff denies each and every allegation in paragraph 61.

SIXTH: Plaintiff denies each and every allegation in paragraph 62.

WHEREFORE, Plaintiff respectfully request that this Court dismiss the Counterclaim; and together with such other and further relief that this Court deems just and proper.

Dated: Flushing, New York
July 29, 2008

Respectfully submitted
Dai & Associates, P.C.

/s/

By: Joel Scott Ray (JR7750)
Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

I, Joel Scott Ray, hereby certify that on July 29, 2008, the foregoing, **REPLY**, was filed electronically through the Electronic Case Filing (“ECF”) system to be served by operation of the Court’s ECF system upon the participating parties and by the U.S. Postal Officer’s first class mail upon the non-participating party:

Xin Miao, Inc.
110-90 Dunkirk Street, 1st Floor
Jamaica, NY 11412

Dated: Flushing, New York
July 29, 2008

/s/
Joel Scott Ray (JR7750)